

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHERYL BISHOP,

Plaintiff,

v.

MERRICK GARLAND, ATTORNEY
GENERAL, DEPARTMENT OF JUSTICE,
ALCOHOL, TOBACCO, FIREARMS AND
EXPLOSIVES,

Defendant.

No. 2:20-CV-01375 RSM

STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINE FOR THE
PURPOSE OF TAKING DEPOSITIONS

NOW COME Plaintiff Cheryl Bishop and Defendant Merrick Garland, Attorney General, by and through their respective counsel and jointly request that the Court modify the discovery deadline from November 29, 2021, to December 15, 2021, for the limited purpose of Plaintiff's depositions of (1) Defendants' Rule 30(b)(6) designee and (2) ATF employee Tehran Palmer.

The parties are cooperating in discovery and believe that the adjustments are necessary for the orderly development of the case, and the requested adjustment to the case schedule will not impact other deadlines and will not affect the trial date.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

MacDONALD HOAGUE & BAYLESS

NICHOLAS W. BROWN
United States Attorney

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINE
FOR THE PURPOSE OF TAKING DEPOSITIONS - 1

No. 2:20-CV-01375 RSM

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MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

1 DATED: November 12, 2021

DATED: November 12, 2021

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| <p>2 <u>s/ Jesse Wing</u></p> <p>3 Jesse Wing, WSBA #27751</p> <p>4 McDonald Hoague & Bayless</p> <p>5 705 Second Avenue, Suite 1500</p> <p>6 Seattle, Washington 98104</p> <p>7 Phone: 206-622-1604</p> <p>8 Email: JesseW@MHB.com</p> <p>9 <i>Attorney for Plaintiff</i></p> | <p><u>s/ Randy J. Tanner</u></p> <p>Mark Steger Smith, #4160</p> <p>Randy J. Tanner, #11609</p> <p>Special Assistant U. S. Attorneys</p> <p>U.S. Attorney's Office</p> <p>105 E. Pine, 2nd Floor</p> <p>Missoula, MT 59802</p> <p>Phone: (406) 329-4268</p> <p>Email: mark.smith3@usdoj.gov</p> <p>randy.tanner@usdoj.gov</p> <p><i>Attorneys for Defendant</i></p> |
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11 PURSUANT TO STIPULATION, IT IS SO ORDERED that

- 12 1. Discovery Deadline is extended to December 15, 2021, for the limited purpose of
- 13 Plaintiff's depositions of (1) Defendants' Rule 30(b)(6) designee and (2) ATF employee
- 14 Tehran Palmer.

15 DATED this 15th day of November, 2021.

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18 RICARDO S. MARTINEZ
19 CHIEF UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed the above-entitled document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

NICHOLAS W. BROWN
United States Attorney

Mark Smith, mark.smith3@usdog.gov
Randy Tanner, randy.tanner@usdoj.gov
Assistant U.S. Attorneys

DATED this 12th day of November, 2021, at Seattle, Washington.

s/ Marry Marze
Marry Marze, Legal Assistant